

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

JOHN STUART,

Defendant.

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**21-CR-07-LJV-JJM**

**NOTICE OF MOTION**

**MOTION BY:**

Jeffrey T. Bagley, Assistant Federal Public  
Defender

**DATE, TIME & PLACE:**

Before the Honorable Lawrence J. Vilardo, United  
States District Court Judge, Robert H. Jackson  
United States Courthouse, 2 Niagara Square,  
Buffalo, New York, **on the papers submitted.**

**SUPPORTING PAPERS:**

Affirmation of Assistant Federal Public Defender  
Jeffrey T. Bagley, dated November 27, 2023

**RELIEF REQUESTED:**

Extension of Time to File Supplemental Submission  
until Friday, December 1, 2023.

**DATED:**

Buffalo, New York, November 27, 2023.

Respectfully submitted,

**/s/ Jeffrey T. Bagley**

Jeffrey T. Bagley  
Assistant Federal Public Defender  
Federal Public Defender's Office  
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Buffalo, New York 14202  
(716) 551-3341, (716) 551-3346 (Fax)  
jeffrey\_bagley@fd.org  
*Counsel for Defendant John Stuart*

**TO:** David J. Rudroff  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
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**AFFIRMATION**

**JEFFREY T. BAGLEY**, affirms under penalty of perjury that:

1. I am an Assistant Federal Public Defender for the Western District of New York and I represent the defendant, John Stuart, in the instant matter.

2. Mr. Stuart's Supplemental Memorandum is due today. I have been sick and unable to complete the brief.

3. This motion respectfully requests an extension of time until Friday, December 1, 2023, to file the supplemental submission.

4. Assistant U.S. Attorney David Rudroff has no objection to this request.

**DATED:** Buffalo, New York, November 27, 2023.

Respectfully submitted,

**/s/ Jeffrey T. Bagley**

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**TO:** David J. Rudroff  
Assistant United States Attorney